

JUL 30 2015

Mr. Mark W. Maxwell
University of Iowa
200 USB
Iowa City, Iowa 52242

RE: Request for a Compliance Extension 40 CFR Part 63 Subpart DDDDD

Dear Mr. Maxwell:

This letter is in response to your request dated July 1, 2015 for a compliance extension for the University of Iowa's facility to comply with the Industrial, Commercial, and Institutional Boilers and Process Heaters (Boiler MACT). The Boiler MACT compliance date for University of Iowa's boilers 10 and 11 is currently September 3, 2016 due to your extension request approved December 24, 2014. University of Iowa has requested a subsequent full year compliance extension year until January 31, 2017, according to the provisions under 40 CFR § 63.6(i), because University of Iowa asserts it needs additional time for the installation of controls.

The U.S. Environmental Protection Agency, Region 7 (EPA), by this letter approves your request for a one-year extension of the compliance date with the Boiler MACT rule for the University of Iowa facility. Therefore, the approved compliance date for University of Iowa will be January 31, 2017.

Pursuant to 40 CFR § 63.6(i)(4)(i), the compliance extension must be incorporated into the Title V permit. Notwithstanding this extension of compliance for the provisions listed above, University of Iowa must meet all other applicable federal and State requirements. Pursuant to Section 113 of the Clean Air Act, University of Iowa may be subject to civil fines and penalties of up to \$37,500 per day per violation, should compliance with 40 CFR Part 63 Subpart DDDDD not be achieved by the extended compliance date of September 30, 2016.

If you have any further questions regarding this compliance extension, please contact Lisa Hanlon at (913) 551-7599.

Sincerely,

Mark A. Smith, Chief
Air Permitting and Compliance Branch

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Office	ACES	ACES	APCO
Name	Hanlon	Werner	Smith
Initial/Date	7/ 14 /15 LTH	7/ 14 /15 LEW	7/23/15 MAS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

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University of Iowa
200 USB
Iowa City, Iowa 52242

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Sincerely,

A handwritten signature in blue ink, appearing to read "Mark A. Smith".

Mark A. Smith, Chief
Air Permitting and Compliance Branch



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July 1, 2015

Lisa Hanlon
U.S. EPA Region 7
Air Permitting and Compliance
11201 Renner Blvd.
Mail Code: AWMDAPCO
Lenexa, KS 66219

RECEIVED

JUL 07 2015

AWMD/APCO

Subject: University of Iowa Boiler MACT Compliance Extension Request for Boilers 10 and 11 (Plant # 52-01-005, Permit #'s 75-A-282-S4, 94-A-438-P2).

Dear Ms. Hanlon:

In December of 2014 The University of Iowa requested an extension of the January 31, 2016, Boiler MACT compliance date, to allow time for design and construction of a baghouse and sorbent injection system to meet the new emission standard for hydrochloric acid. The University requested an extension date of September 30, 2016, and this was granted by USEPA in a December 24, 2014 letter from Mark A. Smith. Unfortunately, the project has fallen behind the planned schedule, and it now appears we will need additional time to complete the project. The revised project schedule is shown below.

Project Item	Original Completion Date	Revised Completion Date
Submit air construction permit application	12/17/14	02/05/15
Funding request to Iowa Board of Regents	01/20/15	01/20/15
Engineering design and bid document preparation	03/03/15	07/20/15
Funding approve by Iowa Board of Regents	03/11/15	03/11/15
Project Bidding	03/31/15	08/20/15
Receive air construction permits	04/29/15	07/20/15
Contract Award	04/30/15	08/25/15
Develop Final Shop Drawings	06/15/15	10/06/15
Order silo and sorbent injection equipment		10/09/15
Order baghouse, and ID fan equipment	06/15/15	09/02/15
Silo and sorbent injection equipment arrives on site		01/29/16
Demolition activities to prepare for new equipment	11/20/15	02/16/16
Baghouse equipment, and ID Fan arrives.	11/03/15	02/17/16
Install Boiler 11 injection system	11/20/15	07/15/16



THE UNIVERSITY OF IOWA

Utilities and Energy Management

Boiler 11 lime silo and sorbent injection material handling equipment complete	12/31/15	07/15/16
Complete Boiler 11 stack testing to show compliance with the MACT standard.	04/30/16	07/29/16
Boiler 10 lime silo and sorbent injection material handling equipment complete	01/31/16	08/12/16
Boiler 10 outage, final installation of Boiler 10 baghouse, ID fan, and injection system. Commissioning and start-up activities	03/25/16	12/09/16
Complete Boiler 10 stack testing to show compliance with the MACT standard.	06/30/16	12/22/16

To ensure the project does not extend beyond the required compliance date, the university is requesting the full one year extension allowed by 40 CFR 63.6(i). This would extend the compliance date to January 31, 2017.

Please contact me at 319-335-6185, or at mark-maxwell@uiowa.edu with any questions or concerns regarding this extension request.

Sincerely,

Mark W. Maxwell
Environmental Engineer

cc: Brian Hutchins, Section Supervisor
Compliance & Monitoring
Iowa Department of Natural Resources
7900 Hickman Road, Suite 1
Windsor Heights, IA 50324

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